

transduce.

Privacy Policy & Cookies

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1. INTRODUCTION

This is the Privacy Policy of **TRANSDUCE B.V.** (Van Tuyll van Serooskerkenweg 160-4, Amsterdam, The Netherlands) (hereinafter: “TRANSDUCE”, “we” or “us”). The proper handling of personal data is utterly important to us. We therefore take great care when processing and protecting your personal data. This is done in accordance with provisions set out in the applicable [privacy laws](#) (including the General Data Protection Regulation hereafter: GDPR). To ensure your privacy as far as possible, we adhere to the following core values:

- **Individuals’ rights:** We operate with respect to your rights under applicable privacy laws. This includes the right to access, correct, or delete your personal data in accordance with such laws.
- **Information:** We find it utmost important to inform you about the way in which we use your personal data. This is further described in this Privacy Policy.
- **Limited collection:** For your understanding, great care is given to the limitation of information we collect and use. This, in order to limit collection of data to the necessary information for selling our Products and/or providing you with our Services (as defined below).
- **Security:** The appropriate measures are taken to secure your personal data. We demand the same actions from the parties we work with. TRANSDUCE.

This Privacy Policy describes how we implement the above core values and how we respect and protect your right to privacy. We recommend you to read this policy carefully, as it sets out the basis on which we use your personal data when you buy our products online or in one of our TRANSDUCE. points of sale (“Products”), access our websites, interact with us or otherwise use our services and applications (jointly referred to as: “Services”).

2. PERSONAL DATA: COLLECTION AND USAGE

The personal data we collect about you when you buy our Products or use our Services, include the following (hereinafter jointly referred to as: “Personal Data”):

Your contact details. Your name, postal address and other contact details, such as your telephone number and e-mail address, and any other contact details you provide to us (including delivery address when you purchase our Products online).

Your electronic identification data and other information we automatically collect when using our online Services. When visiting our websites or apps, interfere (opening, clicking, reading, cursor-movement etc.) with our newsletter or being confronted with online marketing advertisements of TRANSDUCE., we collect data automatically through your browser or device, by making use of cookies and other technologies to track visitors on the website (including web analytics), such as your IP address, MAC address, your browsing behaviour, the Products and Services you like and the content of your abandoned shopping basket. Please see our Cookie Policy to find out more.



- Your account data. To complete your account at TRANSDUCE. we may use your name, gender, contact details, birthday and other information you voluntarily provide to us, such as your favorite scents, additional interests and favorite categories or personal product advice.
- Your purchases online. To complete your online purchases via the official TRANSDUCE. webshop or via other official social media-channels of TRANSDUCE., we may use your name, gender, telephone number, contact details and all relevant information regarding your purchases, such as the amount and date of your purchases, the Product(s) or service you purchase, the device through which you make your purchases, payment method, payment status, bank account details, voucher code used (if any), gift with purchases (if applicable), optional additional personal card or engraving data, delivery method and delivery address.
- The personal data you share with us during the personalization-process when you buy a personalized TRANSDUCE. product. If you personalize TRANSDUCE. Products via us, we use your personalized data (e.g. the name you would like to be placed on the TRANSDUCE. Products) in order to be able to handle your request and provide you our Services.
- Your data when subscribing to our newsletter. To be able to provide you with the newsletter of TRANSDUCE. containing inspirational and commercial content, we use your email address and additional information if you add such to your profile, such as name, date of birth. TRANSDUCE. may also send out personalized newsletters, based on your personal preferences if you've provided us with those.
- Your communication data. Any data shared by you when communicating with us via email, online, telephone, social media or any other form, such as questions, requests or complaints.
- Your details regarding raffles, subscribe and win, lead generation campaigns, contests or sampling-activation. Any data shared by you when participating in a raffle, subscribe and win, lead generation campaign, contest or sampling-activation.
- Your ratings and reviews and feedback. The opinions, experiences, preferences and interests and Product- or event reviews that you publish on our websites or share with us online or through social media.
- Health data. We can also collect information in relation to your health, such as regarding your allergies. We will only use health data you voluntarily provide us and such only with your prior consent or under your direction to do so and only for the purposes set out in this Privacy Policy. You may refuse or revoke your consent at any time, as set out below (see 'Your Rights').

3. PERSONAL DATA: PURPOSES OF USE

The Personal Data we collect is exclusively used for the following purposes:

- For the performance of our agreement with you: In order to carry out our obligations arising from any contracts entered into between you and us, and to provide you with the Products, Services and information that you request, including managing and handling your requests, inquiries or complaints.



- For our legitimate commercial interests: We use your Personal Data as described above (both on aggregated and on individual basis) for the purpose of advertising our Products and Services, to contact you via email, regular mail, social media or otherwise for direct marketing or other commercial purposes. We also use your Personal Data for analysing and improving the quality of our Products and Services, such as providing you with customer services and aftersales, and to understand you as a customer (customer optimization). This enables us to assess what may interest you, to measure or understand the effectiveness of advertising we serve to you and others and to deliver relevant advertising. In addition, based on your use of our Services and Products you purchased, we may target you with advertisement or other marketing materials that are customized to your personal preferences and experiences.
- We may also use your Personal Data, for our other legitimate commercial interests such as to operate and expand our business activities; to develop and improve or modify our Products and Services; to generate aggregated statistics about the users of our Products and Services; to facilitate our business operations; to operate company policies and procedures; to enable us to make corporate transactions, such as any merger, sale, reorganization, transfer of TRANSDUCE.'s assets or businesses, acquisition, bankruptcy, or similar event; or for other legitimate business purposes permitted by applicable law.
- Use of information based on your consent: If you haven't purchased any Product from us, we will only send you direct marketing communications (such as newsletters, promotions, news on products or service updates) via email, other electronic means, via telephone or via hardcopy mail (such as flyers), after we have received your consent to do so.

We use your health data for the purposes set out in this Privacy Policy but we will only do so after we have received your consent thereto.

Children under the age of 16 cannot legally give their consent. Instead, consent of their parent(s) or legal guardian needs to be provided.

You can withdraw your consent at any time (see the section Your rights below).

To comply with our legal obligations: Any Personal Data we collect may be used to comply with a legal obligation to which we are subject, such as supervisory bodies, fiscal authorities or investigation bodies.

4. APPLICATION & WEBSITE

While using our application/website, in order to provide features of our application/website, we may collect, with your prior permission:

- Information regarding your location



We use this information to provide features of our service, to improve and customize our service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it may be simply stored on your device. You can enable or disable access to this information at any time, through your device settings.

- **Tracking Technologies and Cookies**

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are **beacons, tags, and scripts** to collect and track information and to improve and analyze our service. The technologies we use may include:

- Cookies or Browser Cookies. A cookie is a small file placed on your device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our service. Unless you have adjusted your browser setting so that it will refuse Cookies, our service may use Cookies.
- Flash Cookies. Certain features of our service may use local stored objects (or Flash Cookies) to collect and store information about your preferences or your activity on our service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how You can delete Flash Cookies, please read "Where can I change the settings for disabling, or deleting local shared objects?" available at https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main_Where_can_I_change_the_settings_for_disabling_or_deleting_local_shared_objects
- Web Beacons. Certain sections of our service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

For more information about the cookies we use and your choices regarding cookies, please visit the Cookies section of our Privacy Policy.

5. COOKIES

We use cookies and similar technologies like pixels, tags, web beacons, and other identifiers to help us personalize our website for you, remember your preferences, understand how users are using our website or app, and help customize our marketing offerings.

As earlier described, a cookie is a small data file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. TRANSDUCE. uses both types of cookies. Session cookies will only stay on your device until you stop browsing.



Persistent cookies stay on your computer or mobile device until they expire or are deleted. We use the following types of cookies on our website.

- Strictly necessary cookies. These cookies are essential for you to browse our website and use its features. Without these cookies, services like shopping baskets cannot be provided.
- Performance cookies. These cookies collect information about how you use our websites. This data may be used to help optimize our website and make it easier for you to navigate.
- Functional cookies. These cookies allow our websites to remember choices you make whilst browsing and personalize your experience. We may store your geographic location in a cookie for instance, to ensure that we show you the website relevant to your area.
- Third Party cookies. Third party cookies are those placed by websites and/or parties other than TRANSDUCE. These cookies may be used on our website to improve our products or services or to help us provide more relevant advertising. These cookies are subject to their respective privacy policies for these external services, for example, [Facebook Data Use Policy](#).
- Analytics cookies. We use analytics cookies, like those offered by Google Analytics, to help us understand things like how long a visitor stays on our website, what pages they find most useful, and how they arrived at [transduce.eu](#) or [transducearomas.com](#). To learn more about Google Analytics and your data, visit this [Google webpage](#).

More information about cookies we use on our website is included here.

6. SOCIAL MEDIA

When you participate in various social media forums like Facebook, Twitter, Pinterest, Instagram, LinkedIn, etc., you should be familiar with and understand the tools provided by those sites that allow you to make choices about how you share the personal data in your social media profile(s).

TRANSDUCE. is bound to the privacy practices and policies of these third parties, so we encourage you to read the applicable privacy notices, terms of use and related information about how your personal data is used in these social media environments.

Also, depending on the choices you have made regarding your settings on various social media sites (and/or in combination with your settings on the TRANSDUCE. pages), certain personal data may be shared with TRANSDUCE. about your online activities and social media profiles (e.g. interests, marital status, gender, user name, photo, comments and content you have posted/shared etc.).



7. SHARING YOUR PERSONAL DATA

We share your Personal Data with the following parties:

- Other entities within the TRANSDUCE. community: Your Personal Data will be shared between the responsible TRANSDUCE. entities that may use your Personal Data as described in this Privacy Policy. An overview of the relevant responsible TRANSDUCE. entities can be found in the next paragraph.
- Third Party suppliers. We engage with third parties to help us providing our Products and Services, including:
 - Business partners, suppliers (such as IT service providers) and sub-contractors;
 - Contact centers, to assist us on the Consumer Service-department;
 - Advertising and media companies that carry out marketing and media activities on our behalf;
 - Analytics and search engine providers that assist us in the improvement and optimisation of our website and apps, such as Google Analytics.

In providing their services, they will access, receive, maintain or otherwise process Personal Data on our behalf. Our contracts with these service providers do not permit use of your Personal Data for their own (marketing) purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require such Third Party suppliers to adequately safeguard your Personal Data and only process it in accordance with our instructions.

- Corporate transaction. In addition, Personal Data may be disclosed as part of any merger, sale or transfer of TRANSDUCE.'s assets.
- Third parties in case of legal requirement. We may also disclose your Personal Data if we believe we are required to do so by law.
- With consent. We may also disclose information about you, including Personal Data to any other third party, where you have consented or requested that we do so, for example in case of a promotional campaign with another sponsor.

8. SECURITY

We will take the responsible steps to ensure that your Personal Data is properly secured using appropriate technical, physical, and organizational measures, so that they are protected against unauthorized or unlawful use, alteration, unauthorized access or disclosure, accidental or wrongful destruction, and loss.

We take steps to limit access to your Personal Data to those persons who need to have access to it for one of the purposes listed in this Privacy Policy. Furthermore, we contractually ensure that any Third Party supplier processing your Personal Data equally provides for confidentiality and integrity of your data in a secure way.



9. DATA RETENTION

We retain your Personal Data for as long as required to satisfy the purpose for which they were collected and used (for example, for the time necessary for us to provide you with customer service, answer queries or resolve technical problems), unless a longer period is necessary for our legal obligations or to defend a legal claim.

10. YOUR RIGHT

Subject to the conditions set forth in the applicable law, you have the the following rights with regard to our processing of your Personal Data:

- **Right of access** – You have the right to request confirmation when TRANSDUCE. processes personal data about you, and when such is the case, access to the personal data and additional information.
- **Right to rectification** – You have the right to request that TRANSDUCE. corrects, adjusts or completes your Personal Data if we have inaccurate or incomplete data relating to you. You can also correct, adjust or complete your personal data yourself by updating your profile. We also kindly request you to ensure that changes in personal circumstances (for example, change of address, bank account, etc.) are notified to TRANSDUCE. so that we can ensure that your Personal Data is up-to-date. TRANSDUCE. will take all reasonable steps to ensure that all Personal Data are correct;
- **Right to withdraw consent** – You have the right to revoke your consent for receiving marketing communications at any time, by following the instructions in any marketing communication or by filling in the form as set out below. If we use your Personal Data based on your consent for other reasons than marketing communication, you can revoke your consent by filling the form as set out below;
- **Right to delete** - You have the right to request deletion of any irrelevant Personal Data we hold about you when (i) the data is no longer necessary in relation to the purposes for which they are collected; (ii) you withdraw your consent and there is no other legal ground for processing; (iii) you object to the processing in case of direct marketing purposes, or – in any other case - there is no overriding legitimate ground for processing; (iv) we unlawfully processed your data. If you have such a request and all requirements are met, we shall make sure that TRANSDUCE. erases the data of which we are not under a legal obligation to retain;
- **Right to restriction of data use** - You have the right to restrict our use of your Personal Data where (i) you contest the accuracy of the Personal Data; (ii) the use is unlawful but you do not want us to erase the data; (iii) we no longer need the Personal Data for the relevant purposes, but you require them for the establishment, exercise or defense of legal claims; or (iv) you have objected to data use justified on our legitimate interests



pending verification as to whether TRANSDUCE. has indeed compelling interests to continue the relevant data use;

- **Right to data portability** - to the extent that we use your Personal Data for the performance of an agreement with you, and that personal data is processed by automatic means, you have the right to receive all such Personal Data which you have provided to TRANSDUCE. in a structured, commonly used and machine-readable format, and also to require us to transmit it to another data controller where this is technically feasible;
- **Right to object** - to the extent that we are relying on our legitimate interests to use your Personal Data, you have the right to object to such use, and we must stop such processing unless we can either demonstrate compelling legitimate grounds for the use that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. You also have the right to object to profiling activities conducted by TRANSDUCE.;
- **Right to lodge a complaint** - You also have the right to lodge a complaint with a supervisory authority, in particular in your Member State of residence, if you consider that the collection and use of your Personal Data infringes this Privacy Policy or applicable law.

11. CHANGES TO THE POLICY

This Privacy Policy may be revised when updates in international/local regulations occur. If a fundamental change to the nature of the use of your personal data is involved or if the change is in any other manner relevant to you, we will ensure that information is provided to you well in advance of the change actually taking effect.

12. CONTACT US

If you have any queries about this Privacy Policy or our handling of your Personal Data in general, please email us at info@transducearomas.com and be sure to indicate the nature of your query.